

**REMARKS****I. STATUS OF THE CLAIMS**

In accordance with the foregoing claims 3 and 10 have been amended. FIG. 2B has been amended to correct the minor informality indicated by the Examiner.

No new matter is being presented, and approval and entry of the foregoing amendments is respectfully requested.

Claims 1-27 are pending and claims 17-25 and 27 are withdrawn from consideration. Reconsideration is requested.

Applicants acknowledge with appreciation the indication that claims 6 and 14 recite patentable subject matter and would be allowable if rewritten in independent form to include all of the features of the base claim and any intervening claims.

**II. OBJECTIONS TO THE DRAWINGS**

In the Office Action at page 3, the drawings were objected to as failing to comply with 37 CFR §1.84(p)(4). In view of the accompanying separate Letter to the Examiner Requesting Approval of Changes to the Drawings, corrections to FIG. 2B have been requested. Element 25A of FIG. 2B has been deleted as suggested by the Examiner. Therefore, the outstanding drawing objections should be resolved.

Reconsideration and withdrawal of the outstanding objections to the drawings are respectfully requested.

**III. THE OBJECTION TO THE SPECIFICATION**

The specification has been reviewed at paragraphs [0027] and [0029] in response to this Office Action. Changes have been made to the specification only to place the specification in preferred and better U.S. form for issuance and to resolve the Examiner's objections raised in the Office Action. No new matter has been added.

**IV. THE REJECTION OF CLAIMS 1-5, 9-13 AND 26 UNDER 35 U.S.C. §102(b) AS BEING ANTICIPATED BY U.S. PATENT APPLICATION PUBLICATION NO. US2001/40645 TO YAMAZAKI (HEREINAFTER YAMAZAKI '645)**

#### **AMENDMENTS TO THE DRAWINGS**

In the Office Action, the Examiner objected to the drawings. In order to overcome these objections, replacement figures are submitted herewith. In FIG. 2B, element 25a has been deleted as suggested by the Examiner. Approval of these changes to the Drawings is respectfully requested.

Applicants respectfully traverse this rejection for at least the following reason.

Independent claim 1 recites a method of manufacturing a substrate, the method comprising, amongst other novel aspects, preparing an auxiliary substrate, which has at least one flat side and forming a first protective layer on the auxiliary substrate, the **first protective layer being insoluble in a liquid etchant**.

The Office Action relies upon Yamazaki '645 for such a teaching and recites preparing an auxiliary substrate 500 (600) and forming a protective layer 501b or a separating layer 601 on the auxiliary substrate (paragraphs [0076], [0078], [0126]).

However, Yamazaki '645 teaches gradually etching the separating layer 601 (protective layer), by exposing the separating layer 601 (protective layer) to chlorine trifluoride gas, until the separating layer 601 (protective layer) is completely removed (paragraphs [0130], [0131] and [0132]). In other words, Yamazaki '645 discloses a **soluble protective layer**. Contrary to Yamazaki '645, the first protective layer, according to an aspect of the present invention, is insoluble.

Therefore, Yamazaki '645 fails to teach or suggest the **first protective layer being insoluble in a liquid etchant**, as recited in independent claim 1.

Accordingly, Applicants respectfully assert that the rejection of claim 1 under 35 U.S.C. § 102(b) should be withdrawn because Yamazaki '645 fails to teach or suggest each feature of independent claim 1.

Furthermore, Applicants respectfully assert that dependent claim 2 is allowable at least because of its dependence from claim 1, and the reasons set forth above.

Independent claim 3, as newly amended, recites a method of manufacturing an organic electroluminescent display device, the method comprising amongst other novel aspects, forming a first protective layer on the auxiliary substrate, the **first protective layer being insoluble in a liquid etchant**.

As noted above, Yamazaki '645 fails to teach or suggest the **first protective layer being insoluble in a liquid etchant**. As also noted above, Yamazaki '645 teaches etching the separating layer 601 until the separating layer 601 is completely removed (paragraphs [0131] and [0132]).

Therefore, Yamazaki '645 fails to teach or suggest the **first protective layer being insoluble in a liquid etchant**, as recited in newly amended independent claim 3.

Accordingly, Applicants respectfully assert that the rejection of claim 3 under 35 U.S.C. § 102(b) should be withdrawn because Yamazaki '645 fails to teach or suggest each feature of independent claim 3, as amended.

Furthermore, Applicants respectfully assert that dependent claims 4-5 and 9 are allowable at least because of their dependence from claim 3, and the reasons set forth above.

Independent claim 10, as newly amended, recites a method of manufacturing an organic electroluminescent display device, the method comprising amongst other novel aspects, forming a first protective layer on the auxiliary substrate, **the first protective layer being insoluble in a liquid etchant**.

As noted above, Yamazaki '645 teaches etching the separating layer 601 until the separating layer 601 is completely removed (paragraphs [0131] and [0132]). Therefore, Yamazaki '645 fails to teach or suggest the **first protective layer being insoluble in a liquid etchant**, as recited in newly amended independent claim 10.

Accordingly, Applicants respectfully assert that the rejection of claim 10 under 35 U.S.C. § 102(b) should be withdrawn because Yamazaki '645 fails to teach or suggest each feature of independent claim 10, as amended.

Furthermore, Applicants respectfully assert that dependent claims 11-13 and 16 are allowable at least because of their dependence from claim 10, and the reasons set forth above.

Independent claim 26, recites a process of preparing a product comprising an organic electroluminescent display device, the process comprising amongst other novel aspects, forming a first protective layer on the auxiliary substrate, **the first protective layer being insoluble in a liquid etchant**.

As noted above, Yamazaki '645 teaches etching the separating layer 601 until the separating layer 601 is completely removed (paragraphs [0131] and [0132]). Therefore, Yamazaki '645 fails to teach or suggest the **first protective layer being insoluble in a liquid etchant**, as recited in independent claim 26.

Accordingly, Applicants respectfully assert that the rejection of claim 26 under 35 U.S.C. § 102(b) should be withdrawn because Yamazaki '645 fails to teach or suggest each feature of independent claim 26.

V. THE REJECTION OF CLAIMS 7, 8 AND 15 UNDER 35 U.S.C. §103(a) AS BEING

UNPATENTABLE OVER YAMAZAKI '645 IN VIEW OF U.S. PATENT NO. 5,821,138 TO YAMAZAKI (HEREINAFTER YAMAZAKI '138)

Applicants respectfully traverse this rejection for at least the following reason.

Claims 7 and 8 depend from independent claim 1 and as noted above, Yamazaki '645 fails to teach or suggest preparing an auxiliary substrate and forming a first protective layer on the auxiliary substrate, **the first protective layer being insoluble in a liquid etchant**, as recited in independent claim 1.

Yamazaki '138 teaches a method of manufacturing a semiconductor device comprising forming a first insulating film 102 on a first substrate 101, forming a second insulating film on the first insulating film 102 and after various processes, **etching the first insulating film 102** using a buffer hydrofluoric acid to peel off the first substrate 101 (column 2, lines 61-65 through column 3, lines 1-2; column 6, lines 61-62; and column 9, lines 26-27). Therefore, Yamazaki '138 teaches etching the first insulating film using a wet etching process.

Accordingly, Yamazaki '138 fails to teach or suggest forming a first protective layer on the auxiliary substrate, **the first protective layer being insoluble in a liquid etchant**, as recited in independent claim 1. Therefore, Yamazaki '138 fails to cure the deficiencies of Yamazaki '645.

Accordingly, Applicants respectfully assert that the rejection of claims 7 and 8 under 35 U.S.C. § 103(a) should be withdrawn because neither Yamazaki '645 nor Yamazaki '138 teach or suggest each feature of independent claim 1, upon which claims 7 and 8 depend.

Claim 15 depends upon independent claim 10. Claim 10 as amended recites forming a first protective layer on the auxiliary substrate, **the first protective layer being insoluble in a liquid etchant**. As noted above, neither Yamazaki '645 nor Yamazaki '138 whether taken singly or combined teach or suggest forming a first protective layer on the auxiliary substrate, **the first protective layer being insoluble in a liquid etchant**.

Accordingly, Applicants respectfully assert that the rejection of claim 15 under 35 U.S.C. § 103(a) should be withdrawn because neither Yamazaki '645 nor Yamazaki '138 teach or suggest each feature of independent claim 10, upon which claim 15 depends.

## VI. CONCLUSION:

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. And further, it is

respectfully submitted that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

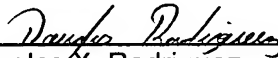
If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any additional fees associated with the filing of this Amendment, please charge the same to our Deposit Account No. 50333.

Respectfully submitted,

STEIN, MCEWEN & BUI, LLP

Date: 5/13/05

By:   
Douglas X. Rodriguez  
Registration No. 47,269

1400 Eye St., NW  
Suite 300  
Washington, D.C. 20005  
Telephone: (202) 216-9505  
Facsimile: (202) 216-9510



FIG. 1

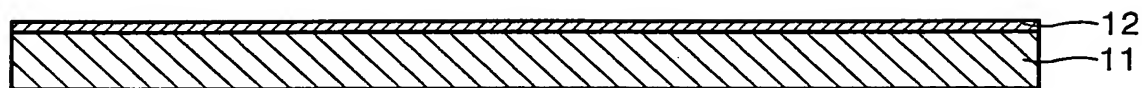


FIG. 2A

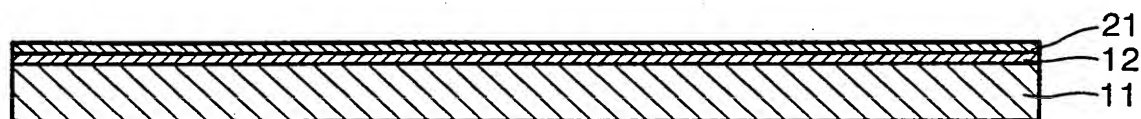


FIG. 2B

